

Remarks:

This amendment is submitted in an earnest effort to advance this case to issue without delay.

The specification has been amended to eliminate some minor obvious errors. No new matter whatsoever has been added.

The claims have been heavily amended to place them in better US form, overcome the §112 problems, eliminate multiple dependencies, and define the invention with greater particularity over the art. The subject matter of now-canceled claims 2 and 16 has been inserted into independent claims 1 and 14.

Claims 1 and 14 stand rejected under §102 on US 2002/0085540 of Hyvarinen. The invention, as now claimed, discloses that the step of

selecting among a plurality of systems at least a first and a second system for the provision of requested telecommunication services by subdividing the requested telecommunication services into a first set which is substantially provided through a second system and a second set which can be provided through a first and said second system. Further, the invention, as now claimed, claims verifying on the basis of this

subdivision the possibility of allocating the requested telecommunication services on the appropriate system.

These features are not disclose in Hyvarinen as is clear from the fact that the ¶102 rejection was not applied to claims 2 and 16 that recite these features now in independent claims 1 and 14.

Original claims 2 and 16 (now part of claims 1 and 14) also were rejected under §103 in view of Hyvarinen in combination with US 2003/0126263 of Fenton. This rejection is inapposite because:

The claims now recite the step of selecting among a plurality of systems at least a first and a second system for the provision of requested telecommunication services by subdividing the requested telecommunication services into a first set which is substantially provided through a second system and a second set which can be provided through a first and said second system. Further, the claims now recite the step of verifying on the basis of this subdivision the possibility of allocating the requested telecommunication services on the appropriate system.

Hyvarinen relates to a method for providing a telecommunication service in a wireless telecommunication system comprising a wireless local network, at least one public mobile network, at least one mobile station supporting both of the networks and at least one terminal. Availability of a service requested by a user and reachability of the terminal are checked in

the local network when the mobile-station user needs to communicate with the terminal. The terminal to be reached may be another mobile station or a file server, for instance. If the requested service cannot be substantially provided as requested and/or the terminal cannot be reached via the local network, the data transmission service is requested from a public land mobile network (PLMN).

Fenton relates to a method for balancing multimedia message loading within a network having two or more multimedia service relays and two or more multimedia service servers. When a multimedia message is received at the input/output device or load balancer for the network, one of the multimedia service relays is selected to process the multimedia message. The load balancer is communicably coupled to two or more multimedia service relays and two or more multimedia service servers. The multimedia message is then sent to the selected multimedia service relay for processing. Thereafter, the processed multimedia message is received from the selected multimedia service relay, one of the multimedia service servers is selected to store the multimedia message on a message storage device communicably coupled to the selected multimedia service server, and the processed multimedia message is sent to the selected multimedia service server.

It is respectfully submitted that neither Hyvarinen nor Fenton taken alone or in combination teaches or even suggests a

step of subdividing the telecommunication services into a first and a second set and on the basis of this subdivision verifying the possibility allocating the requested telecommunication services on the appropriate system so as to improve the management of the radio resources required to deliver the telecommunication services.

In fact, Hyvarinen only teaches that if the requested service cannot be substantially provided as requested, the service is requested from a public land mobile network (PLMN). However, this step is performed independently by the type of service that is requested. Fenton discloses that when a multimedia message is received at the input/output device or load balancer for the network, one of the multimedia service relays is selected to process the multimedia message. However, this selection is performed by load balancing and not on the basis of the type of multimedia message to be processed.

Thus a person of ordinary skill in the art would not find any motivation to combine the teachings of Hyvarinen and Fenton so as to obtain the present invention. The \$103 rejection must fall.

If only minor problems that could be corrected by means of a telephone conference stand in the way of allowance of this

case, the examiner is invited to call the undersigned to make the necessary corrections.

K.F. Ross P.C.

/Andrew Wilford/

by: Andrew Wilford, 26,597
Attorney for Applicant

08 July 2008
5683 Riverdale Avenue Box 900
Bronx, NY 10471-0900
Cust. No.: 535
Tel: 718 884-6600
Fax: 718 601-1099
Email: email@kfrpc.com

Enclosure: Extension (three months)
 Marked Specification
 Clean Specification
 Replacement drawing (3 sheets)